

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

HERBERT and DORIS STEELE, ERIC R.  
CHAVEZ, ALEXANDRA DIAZ, and SONIA  
TORRES, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

GE MONEY BANK, a federal savings bank,  
WMC MORTGAGE CORPORATION and  
WMC MORTGAGE, LLC,

Defendants.

No. 1:08-civ-1880

JUDGE MANNING

MAGISTRATE JUDGE KIM

**AGREED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION  
SETTLEMENT**

Plaintiffs Herbert and Doris Steele, Eric R. Chavez, and Sonia Torres, on behalf of themselves and all others similarly situated (“Plaintiffs”), hereby move for preliminary approval of the settlement of this matter on a classwide basis. WMC Mortgage, LLC (“WMC” or “Defendants”) agrees with Plaintiffs’ motion and the requested Court rulings, although WMC takes no position as to Plaintiffs’ Memorandum of Law. For the reasons stated in Plaintiffs’ Memorandum of Law in support of this motion, the Court should take the following actions:

1. Preliminarily certify the Settlement Class, consisting of:

All Black/African-American or Hispanic borrowers (including, without limitation, individual borrowers, joint-borrowers, and co-borrowers) who, between January 1, 2004 and December 31, 2007, obtained a mortgage loan that was made or purchased by WMC Mortgage, LLC or WMC Mortgage Corp.

2. Enter a Preliminary Approval Order, substantially in the form submitted to the Court by electronic mail, in accordance with Judge Manning's Case Management Procedures, that, *inter alia*, preliminarily approves the proposed settlement, grants Plaintiffs leave to file the Third Amended Complaint, approves the form and dissemination of class Notice, and sets the date for hearing on final approval.

WHEREFORE, the Court should grant Plaintiffs' Agreed Motion for Preliminary Approval of Class Action Settlement and enter the proposed order for preliminary approval.

Respectfully Submitted  
On behalf of the Plaintiffs,

/s/ Gary Klein

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Dated: August 26, 2010

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**CERTIFICATE OF SERVICE**

I, Gary Klein, hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to the non-registered participants by first class mail, postage prepaid, on August 26, 2010.

/s/ Gary Klein  
Gary Klein